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November 15, 2019

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

In the Matter of the Joint Application of Ting Fiber, Inc. and Cedar Holdings Group, Inc. for Grant of Authority to Transfer Control of an Authorized Domestic Section 214 Carrier, WC Docket No. 19-331, filed November 1, 2019.

RE: Requested Supplemental Information

Dear Ms. Dortch,

This letter provides additional information requested by the Commission in the above-referenced matter.¹ Applicant Ting Fiber, Inc., d/b/a Ting Internet, adds the following clarifying information for the record:

1. The formal name of the applicant / transferee is “Ting Fiber, Inc., d/b/a Ting Internet.”
2. Cedar Holdings Group, Inc. wholly owns operational CLEC subsidiaries in Colorado and New Mexico: Zippytech Inc. and Zippytech New Mexico, Inc., respectively. Those entities provide all telecommunication services that are the subject of this transfer, and will continue to do so. They provide telecommunication service in the following markets (by county) in Colorado and New Mexico:

Colorado:

Adams, Arapahoe, Archuleta, Boulder, Delta, Eagle, Garfield, Gunnison, Jefferson, La Plata, Mesa, Moffat, Montezuma, Montrose, Park, Pitkin, Rio Blanco, San Juan, Summit, Weld

New Mexico:

Bernalillo, Cibola, Don Ana, McKinley, San Juan, Santa Fe, Sandoval, Valencia

¹ Via telephone call between Gregory Kwan, Wireline Competition Bureau, and Casey Lide, November 4, 2019.

3. In 2014, Ting Virginia, LLC – a wholly owned subsidiary of Ting Fiber, Inc. – acquired a Virginia CLEC serving the Charlottesville, VA, area, Fiber Roads, LLC. Apart from that transaction, neither Ting Fiber, Inc., Cedar Holdings Group, Inc., Tucows, Inc., nor any affiliated entity owns an interest above ten percent in any other domestic wireline telecommunications carrier.
4. Tucows, Inc. wholly owns a mobile virtual network operator, Ting, Inc., with service launched in 2012. Ting, Inc. obtained an International Telecommunications Certificate granting authority to provide facilities-based service in accordance with section 63.18(e)(1), and resale service in accordance with section 63.18(e)(2), dated July 22, 2011.
5. No party to this transaction or any affiliate of the parties possesses any wireless spectrum license issued by the Commission.
6. In the City of Centennial, Colorado, Ting Fiber, Inc. owns and operates a fiber optic network through which it provides retail Internet access service. Ting Fiber, Inc. may also deliver video service using this network at some point in the future. Ting Fiber, Inc. does not provide telecommunications service nor interconnected VoIP service in Centennial, nor in any other market in Colorado or New Mexico. Note also that neither Zippych, Inc. nor any affiliate of Cedar Holdings Group, Inc. provides telecommunication service to any customer within the City of Centennial.
7. In the Nelson County, Virginia area, Ting Fiber, Inc. operates as an ISP and provides Internet access to customers over fiber optic networks owned by the Nelson County Broadband Authority² and the Rockbridge Area Network Authority.³
8. The applicants seek streamlined treatment pursuant to 47 CFR 63.03(b)(2)(i). Neither of the applicants is dominant with respect to any service.

Should you require any additional information relating to this application, please do not hesitate to contact me.

Best regards,



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² <http://www.nelsoncounty-va.gov/government/broadband-authority/>

³ <https://www.ranabroadband.net/>